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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION

OREGON FIREARMS FEDERATION,)
INC.,)
et al.,)
)Civil No.
Plaintiffs,)2:22-cv-01815-IM
v.)(Lead Case)
)
KATE BROWN, et al.,)Civil No.
)3:22-cv-01859-IM
Defendants.)(Trailing Case)
)
(Continued))Civil No.
)3:22-cv-01862-IM
)(Trailing Case)
)
)Civil No.
)3:22-cv-01869-IM
)(Trailing Case)

* VIDEOCONFERENCE *

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF
EXPERT BRIAN DELAY

Witness located in:
Berkeley, California

* All participants appeared via videoconference *

DATE TAKEN: March 14, 2023

REPORTED BY: Tia B. Reidt, Washington RPR, CCR 2798
Oregon # 22-0001

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(continued))
)
MARK FITZ, et al.,)
)
Plaintiffs,)
v.)
)
ELLEN F. ROSENBLUM, et al.,)
)
Defendants.)

)
)
KATERINA B. EYRE, et al.,)
)
Plaintiffs,)
)
v.)
)
ELLEN F. ROSENBLUM, et al.,)
)
Defendants.)

)
DANIEL AZZOPARDI, et al.,)
)
Plaintiffs,)
v.)
)
ELLEN F. ROSENBLUM, et al.,)
)
Defendants.)

APPEARANCES

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* * * * *

1 I'm not a hundred percent sure about that.

2 BY MR. WILLIAMSON:

3 Q. And do you own these merely as examples or do
4 you shoot them?

5 A. I shoot them.

6 Q. In terms of your own personal research into
7 firearms, do you go to, for example, gun shows or
8 museums where these things are displayed or is it
9 mostly by book?

10 A. Well, most of my work is with documents and
11 books. But I certainly do go to museums and have, you
12 know, learned that way as well.

13 Q. Which museums have you attended?

14 A. Well, the Cody Firearms Museum, for example,
15 where I both got to enjoy the museum as a patron. They
16 have a really remarkable collection and work in the
17 archive there as a researcher.

18 Q. Any other firearms museums?

19 A. Well, collections in other museums. So the
20 Met, for example, has a remarkable collection of arms
21 and armor, including firearms. The British Museum,
22 where I did work in -- I did work in London, research
23 in London for six or seven months. I often went to the
24 British Museum and spent time in their firearms
25 collection just as a patron.

1 encompass the colonies as well.

2 Q. Would it include Europe --

3 A. Yes.

4 Q. -- that statement?

5 Okay.

6 A. That's right.

7 Q. Earlier, you mentioned -- maybe I am
8 misstating this, but you did some research at the Cody
9 Museum; is that correct?

10 A. That's correct.

11 Q. So it was just not -- you weren't there just
12 for a visit. You were doing some primary research?

13 A. Yeah. There is a library and archive there
14 that -- at least I think it still is. At the time, it
15 was called the McCracken Research Library. And the
16 McCracken Research Library has -- among many other
17 amazing collections, they have the Winchester Repeating
18 Arms Company archive.

19 Q. Okay.

20 Are you familiar with a book called "The Guns
21 of John Moses Browning" by Nathan Gorenstein?

22 A. No, I'm not.

23 Q. Did Browning do work for Winchester, do you
24 recall?

25 A. I don't recall. I'm sorry.

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C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of Brian DeLay, having been duly sworn, on March 14, 2023, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 17th day of March, 2023.



/S/ Tia B. Reidt
Tia B. Reidt, # 22-0001
NOTARY PUBLIC, State of
Washington.
My commission expires
5/15/2026.